

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

RICHARD DENNIS, et al.,

Plaintiffs,

-against-

No. 16-cv-06496 (LAK)

JPMORGAN CHASE & CO., et al,

Defendants.

[PROPOSED] PROTECTIVE ORDER

LEWIS A. KAPLAN, *District Judge.*

The parties having agreed to the following terms of confidentiality, and the Court having found that good cause exists for issuance of an appropriately-tailored confidentiality order governing the pre-trial phase of this action, it is therefore hereby

ORDERED that any person subject to this order (the "Order")—including without limitation the parties to this action, their representatives, agents, experts and consultants, all third parties providing discovery in this action, and all other interested persons with actual or constructive notice of this Order—shall adhere to the following terms:

1. All information of any kind provided in the course of discovery in this action, including, without limitation, written discovery responses and deposition testimony, shall be referred to as "Discovery Material." Any person subject to this Order who receives from any other person any Discovery Material shall not disclose such Discovery Material to anyone else except as expressly permitted hereunder.

2. All Discovery Material produced or disclosed in connection with this action shall be used or further disclosed solely for the prosecution or the defense of this action (including any appeal

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Attorneys for Defendant Westpac Banking Corporation

Dated: New York, New York

July 13, 2020

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge



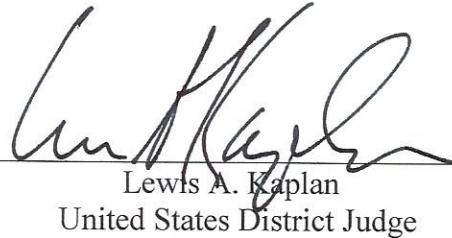
Memorandum Endorsed

Dennis v JPMorgan Chase & Co., 16-cv-06496 (LAK)

Notwithstanding anything in the foregoing, any documents filed with the Court and sealed pursuant to this order shall be unsealed and made public on or after June 15, 2025 absent further order of the Court.

SO ORDERED.

Dated: June 15, 2020



Lewis A. Kaplan
United States District Judge